

1 MAXINE I. DOBRO
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3 BAR #98962

4 Attorney for Defendant
5 Edward Martinez

6
7 **UNITED STATES DISTRICT COURT**
8 **SOUTHERN DISTRICT OF CALIFORNIA**
(Honorable Janis Sammartino)
9

10 UNITED STATES OF AMERICA,) Criminal No. 07-2881-JLS
11)
12 Plaintiff,) **JOINT MOTION TO CONTINUE**
13 vs.) **DATE SET FOR SENTENCING**
14)
15 Edward Ramirez,)
16 Defendant.)
Date: 19 Sept 2008
Time: 9:00 a.m.

17 THE PARTIES, the Plaintiff, UNITED STATES OF AMERICA, through its
18 attorneys, Karen Hewitt, Interim U.S. Attorney, and Peter Mazza,
19 Assistant U.S. Attorney, and defendant Edward Ramirez, through his
20 counsel, Maxine I. Dobro, move to continue the Sentencing hearing in
21 Criminal Case No. 07cr2881-JLS from June 27, 2008, to September 19,
22 2008, at 9:00 a.m. This continuance is requested to allow more time
23 for the parties to negotiate an appropriate sentencing recommendation.

24 DATED: 24 June 2008

/s/Maxine Dobro
Maxine I. Dobro,
for Edward Ramirez

26 DATED: 24 June 2008

/s/Peter Mazza
Peter Mazza
Assistant U.S. Attorney

IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	07CR2881-JLS
)	
Plaintiff,)	
vs.)	CERTIFICATE OF SERVICE
)	
)	
Edward Ramirez,)	
Defendant.)	
_____)	

I, the undersigned, say that I am over 18 years of age, a resident of the County of San Diego, State of California, and not a party to the within action; That my business address is 105 West F St, 3rd Flr, San Diego CA 92101;

That I served the within Joint Motion to Continue Sentencing serving a copy today to the clerk's office of this honorable court by e-filing for delivery to:

KAREN P. HEWITT, INTERIM UNITED STATES ATTORNEY FOR THE SOUTHERN DISTRICT OF CALIFORNIA; PETER MAZZA, SPECIAL ASSISTANT U.S. ATTORNEY.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this June 24, 2008 in San Diego, California.

DATED: 6/24/08

/s/ Maxine I. Dobro
Maxine I. Dobro